



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JDG/EAG/AH
F.#2009R01500

271 Cadman Plaza East
Brooklyn, New York 11201

September 14, 2010

By Federal Express

Michael Gold, Esq.
350 Fifth Ave, Suite 4400
New York, New York 10118

Alex Grosshtern, Esq.
225 Broadway, Suite 630
New York, New York 10007

Re: United States v. Dmitriy Yakovlev, et al.
Criminal Docket No. 09-587 (S-1) (ILG)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

Enclosed are copies of the following materials:

Ex	Description
194	Cablevision telephone records for telephone number (718) 333-9369, subscribed to by "Ravie Khassanchin", for the time period from December 1, 2005 through February 1, 2006
195	Citibank records for a "Variable Rate Ready Credit Account" in the name of Viktor Alekseyev, with account number ending in "0032" for the time period from January 3, 2006 through August 3, 2006
196	Sprint telephone records for telephone number (917) 449-0388, subscribed to by "Sergey Avtushko," for the time period from September 1, 2003 through June 30, 2004

Michael Gold, Esq.
 Alex Grosshtern, Esq.
 September 14, 2010
 Page 2

Ex	Description
197	Sprint telephone records for telephone number (347) 392-1087, subscribed to by "Pasquale Lari," for the time period from January 1, 2004 through March 20, 2004
198	Sprint telephone records for telephone number (917) 662-6670, subscribed to by "Tamara Avetisyan," for the time period from January 1, 2004 through March 1, 2004
199	T-Mobile telephone subscriber record for telephone number (917) 660-8450, subscribed to by "Natalie Sokol," for the time period from September 1, 2005 through January 31, 2006
200	Verizon telephone records for telephone number (718) 787-9640, subscribed to by "Larisa Malytska," for the time period from December 1, 2005 through January 1, 2006
201	Verizon telephone subscriber records for telephone number (973) 482-9438, subscribed to by "Harrison Auto Body," for the time period from January 1, 2004 through August 1, 2004
202	AT&T telephone records for telephone number (917) 515-8590, subscribed to by "Galina Barkhan," for the time period from June 1, 2003 through June 30, 2004
203	AT&T telephone records for telephone number (718) 473-7560, subscribed to by "Gulmira Wilson," for the time period from November 1, 2005 through February 28, 2006
204	AT&T telephone records for telephone number (718) 249-5398, subscribed to by "Sergey Vozny," for the time period from November 1, 2005 through February 28, 2006
205	AT&T telephone records for telephone number (917) 753-7230, subscribed to by "Vladimir Kigel," for the time period from October 1, 2003 through January 31, 2004
206	Photographs of a video cassette tape found near the human remains discovered on January 8, 2006, later determined to be those of Viktor Alekseyev ¹

¹ The contents of the video cassette tape were previously produced on a digital video disc as Discovery Exhibit 162.

Michael Gold, Esq.
 Alex Grosshtrn, Esq.
 September 14, 2010
 Page 3

Ex	Description
207	Compact Disc ("CD") containing recorded telephone calls from the Metropolitan Detention Center, Brooklyn, New York ("MDC") that were recorded between July 13, 2010 and August 26, 2010 (defendants Dmitriy Yakovlev and Julia Yakovlev are captured speaking on the recorded calls)
208	Photographs taken in connection with the execution of the Search Warrants for (a) Safety Deposit Box Number 1083 at JP Morgan Chase Bank, Located at 2623 East 17th Street, Brooklyn, New York; (b) Safety Deposit Box Number 1252 at Astoria Federal Savings Bank, Located at 489 Neptune Avenue, Brooklyn, New York; and (c) Safety Deposit Box Number 1520 at Astoria Federal Savings Bank, Located at 489 Neptune Avenue, Brooklyn, New York (Bates numbered 1 to 58)
209	Photographs of locations in Brooklyn, New York (Bates numbered 1 to 35)
210	Photographs taken in connection with the execution of a consent search of a Ford Expedition automobile that previously belonged to defendant Dmitriy Yakovlev on March 11, 2010
211	Delta Airlines records regarding Viktor Alekseyev's unused ticket from New York, New York to Moscow, Russia on December 20, 2010, and Alekseyev's intended return flight from Moscow to New York on March 20, 2010
212	CD containing crime scene photographs regarding the discovery of human remains on or about January 8, 2006, later determined to be those of Viktor Alekseyev ²

The search warrants described in Discovery Exhibit 208 (and the affidavit in support of those search warrants) were previously provided as Discovery Exhibit 174. Those search warrants were each executed on November 16, 2009. Safety Deposit Box Number 1083 at JP Morgan Chase Bank, located at 2623 East 17th Street, Brooklyn, New York was found to be empty. Safety Deposit Box Number 1252 at Astoria Federal Savings Bank, Located

² Hard copies of these photographs were previously provided as Discovery Exhibit 2.

Michael Gold, Esq.
Alex Grosshtern, Esq.
September 14, 2010
Page 4

at 489 Neptune Avenue, Brooklyn, New York was also found to be empty. Safety Deposit Box Number 1520 at the same Astoria Federal Savings Bank location contained approximately 20 pamphlets, printed in Russian, which appear to be appraisals for jewelry.

A consent search of a Ford Expedition automobile that previously belonged to defendant Dmitriy Yakovlev was executed on March 11, 2010. A variety of items were collected for hair, fiber, trace evidence and forensic examinations, including: (a) pieces of carpet; (b) sections of carpet padding; (c) vacuum sweepings; (d) control fabric samples; (e) debris; (f) a piece of foam; (g) a band-aid; (h) zip ties; (i) a zipper; (j) a piece of tape; and (k) pieces of paper.

The search warrant for One White 2004 Lexus With New York Licence Plate Number BWX 1907, an automobile belonging to the defendants, was executed on July 20, 2010. That search warrant, the affidavit in support, and photographs detailing the execution of the search warrant were previously provided as Discovery Exhibits 168 and 169. A variety of items were collected for hair, fiber, trace evidence and forensic examinations, including: (a) pieces of carpet; (b) a blanket; and (c) vacuum sweepings.

Should you wish to arrange a time to inspect, copy, and/or photograph any physical evidence and original documents or items in the government's possession, please contact us.

Michael Gold, Esq.
Alex Grosshtern, Esq.
September 14, 2010
Page 5

If you have further questions or requests, please
contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/James D. Gatta
James D. Gatta
Elizabeth A. Geddes
Amanda Hector
Assistant U.S. Attorneys

Enclosures

cc: Clerk of Court (ILG) (by ECF) (w/o enclosures)